:43

## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276

Mary A. Gade, Director

217/785-3912

Refer to: L1630200005 -- St. Clair County

Sauget Area 1 Sites - Sauget Superfund/Technical Reports

November 7, 1997

Mr. Jack E. Williams, CPG Phillips Pipe Line Company 3 B12 Adams Building Bartlesville, Oklahoma 74004

Dear Mr. Williams:

As we had discussed last week and after my meeting with some of the staff at your East St. Louis Terminal (Terminal) a few days ago, I am writing you this letter to clarify some of the questions I had asked that relate to current and historical operations at your Terminal. Illinois EPA is specifically looking for any information Phillips Pipe Line Company may have regarding the operation of wastewater treatment processes that discharge or have discharged to the wetland areas south of Cargill Road that forms the southern border of the Terminal property. I have included a map which shows the general locations of where road culverts are believed to exist.

Illinois EPA is aware of one culvert that exists north of the southeast corner of the Terminal property. This culvert was visible on the south side of Cargill Road, but had been apparently been blocked off on the northern end. Does Phillips Pipe Line Company have any information on when this culvert might have been blocked? If so, does any information exist that relates to Terminal-related discharges (e.g. wastewater treatment, stormwater run off, etc...) through this culvert?

Relative to potential discharges at the <u>southwestern</u> portion of the Terminal (near the main river levee), does Phillips Pipe Line Company have information on any culverts or areas that discharge south of Cargill Road? If so, does any information exist that relates to Terminal-related discharges at this possible location?

Concerning flooding events that have occurred at the Terminal (namely the 1992 flood), is Phillips Pipe Line Company aware that any floodwater could have carried Terminal-related contaminants over Cargill Road into the wetlands referenced here? I was under the impression that most of the flooding was restricted to the west of the river levee and that the Terminal only experienced groundwater infiltration from record high river levels in the summer of 1992. Could this be verified?

The major "contaminants of concern" in the wetland areas that receive direct stormwater discharges from Dead Creek appear to be polychlorinated biphenyls (PCBs) and heavy metals. Is there any available information regarding historical and/or current uses of PCBs or heavy metals? If this usage has been identified, have PCBs or heavy metals been involved in any wastestream or treatment process that discharges or has historically discharged into the wetlands south of Cargill Road? Have soil investigations performed at the Terminal ever indicated the presence of PCBs or heavy metals?

If you or any Phillips Pipe Line Company official have questions or concerns about this letter, please do not hesitate to contact me at the above number. I would appreciate at least verbal answers to these questions sometime by early December with a written response to follow.

Thank you for your attention.

Yours Truly.

Paul E. Takács, Project Manager

**National Priorities Unit** 

Division of Remediation Management

Bureau of Land

Attachment - Location Map

cc: Clarence Hill, Phillips Pipe Line
Terry Ayers

Leah Evison, USEPA

Division File

